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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

January 18, 2011

Dear Sauget Area 2 Sites Group:

Thank you for attending the December 9, 2010 meeting between the United States Environmental Protection Agency (USEPA), the Illinois Environmental Protection Agency (Illinois EPA) and the Sauget Area 2 Sites Group (SA2SG) at the USEPA Region 5 office to discuss the Sauget Area 2 Site (SA2).

During the course of the meeting, several issues were raised that required additional information from USEPA. The purpose of this letter is to provide the SA2SG with the necessary follow-up on these issues. Specifically, this letter provides SA2SG with a full ARARs table; provides direction on how to proceed with the SA2 RI/FS with groundwater as a separate operable unit; provides examples of approved RAOs; and transmits a request to evaluate the approved groundwater model based on the more current assumption that the Illinois Department of Transportation (IDOT) wells will continue to pump for highway dewatering purposes and will not cease pumping in 2010, as originally assumed.

Enclosed with this letter is Illinois EPA's full list of potential ARARs for the SA2 sites. As discussed previously, a detailed ARARs evaluation was lacking in the draft Feasibility Study (FS). As we stated at our meeting, the SA2SG must fully vet the attached list in its next draft of the report. In support of this effort, the SA2SG should anticipate future meetings and/or conference calls with USEPA and Illinois EPA to discuss the vetting of the ARARs list. For the FS to be approvable the SA2SG must provide detailed discussion and sufficient justification, on a site by site basis, on compliance with the identified ARARs.

In the agencies' November 18th, 2010 letter to you, we stated that groundwater from the Sauget Area 1 (SA1) and SA2 sites would be treated as a separate operable unit. During our meeting, the SA2SG expressed concern over completing a separate FS for the groundwater operable unit, specifically due to the complexity of coordinating this effort with the SA1 Sites Group. In recognition of the SA2SG's concern, we have determined that the best path forward for obtaining remedy selection for groundwater in a timely and efficient manner is for the SA2SG to complete the FS by including alternatives for both capping remedies as well as groundwater remedies. If the SA2 and SA1 FS are structured appropriately, such that alternatives are assessed as single components versus multi-component alternatives, USEPA will address the Sites and groundwater by issuing 3 RODs: a ROD for the SA2 sites that includes final action for landfill covers and interim action for groundwater sources, a ROD for the SA1 sites that includes final action for landfill covers and interim action for groundwater sources, and, subsequently, a final ROD for the groundwater operable unit.

At our meeting, you requested examples of Remedial Action Objectives (RAOs) that have been approved. Each site is unique and RAOs need to be devised accordingly. USEPA's Guidance for *Conducting Remedial Investigations and Feasibility Studies under CERCLA* (October 1988) (www.epa.gov/superfund/policy/remedy/pdfs/540g-89004-s.pdf) discusses the process for developing RAOs as well as provides several examples in Table 4-1. Additional examples of approved RAOs can be found in site RODs at on USEPA's website: www.epa.gov/region5superfund/rods/rod_index.html#rod_illinois.

We also discussed at the meeting the recent information on the IDOT wells used for highway dewatering and how IDOT's plans to continue pumping the wells may or may not affect the groundwater plume. The original assumption used in the regional groundwater flow model (GSI, 2008) was that IDOT would cease pumping in 2010. Therefore, as this assumption was incorrect, USEPA requests the SA2SG evaluate the model based on this changed assumption and provide USEPA with a summary report.

We would like to schedule our next meeting for February 24, 2011 to discuss the vetting of the ARARs table and any questions you may have regarding this letter. In preparation for our next meeting, the SA2SG should provide USEPA with any comments they may have on the ARARs listed in the table by February 11th.

Sincerely,



Stephanie Linebaugh
USEPA Project Manager

cc: Clarence Smith, Illinois EPA
Bob Carson, Illinois EPA
Paul Lake, Illinois EPA
Jim Morgan, IAGO